



1 Yitzchok Birnhack
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Pro Se Defendant
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7 **IN THE UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

9 HFC ACCEPTANCE, LLC, a
10 California limited liability company,

11 Plaintiff,

12 vs.

13 AEZ Rent A Car LLC, a New York limited
liability company; ICR Group LLC, a New York
14 limited liability company; JHRC Corp., a New
York corporation; The Bar, LLC, a New York
15 limited liability company, WCR Group, LLC, a
New York limited liability company; YTS Group
16 LLC, a New York limited liability company;
Yitzchok M. Birnhack, an individual domiciled in
17 New York,

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19 Defendants.
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Case No.: 2:23-cv-07744-GW-AGR

**NOTICE OF MOTION TO STAY FOR 45
DAY PAUSE IN COURT PROCEEDINGS
FOR DEFENDANT YITZCHOK M.
BIRNHACK**

Judge: Hon. George H. Wu
Action Filed: September 15, 2023
Trial Date: June 17, 2025

Date: May 12, 2025
Time: 8:30 a.m.
Courtroom: 9D

- 21 1. I, Yitzchok Birnhack, am requesting the court approve our Motion to Stay and temporarily
22 halt court proceedings for a total of 45 days, pending obtaining attorney representation for
23 our behalf.
24 2. I am a defendant in this action. The statements herein are true and correct.
25 3. As the court and opposing counsel are aware, I have been attempting to seek counsel in
26 California, which has proven to be a difficult matter, and thus has created a hardship in my
27 ability to move forward with the case.
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- 1 4. My office has reached out to a total of ten (10) firms, none of whom are able to agree to
- 2 provide representation, nor suggest or provide referrals of other counsel for us to contact.
- 3 5. During this time, opposing counsel has been moving forward at a rate we simply cannot
- 4 keep up with without representation.
- 5 6. It has become very clear that we cannot represent ourselves, and we are struggling with this
- 6 case, especially with answering motions, requests, etc., from the opposing side. It is not our
- 7 intention to disregard opposing counsel's demands. It is simply very difficult for us to move
- 8 forward without having proper representation and guidance. We have no familiarity or
- 9 experience in this type of matter and handling it on our own, and moreover, we are not
- 10 aware of how the California court system operates.
- 11 7. In order to have a fair continuation of proceedings, we will need to have expertise to guide
- 12 us further along, which unfortunately has proven to be taking longer to acquire.
- 13 8. I hope the court understands my position and will grant our request to Stay and halt
- 14 proceedings for 45 days. This will allow us the time necessary to be able to catch up to
- 15 opposing counsel through means of obtaining our own representation, thus creating a fair
- 16 and equal way to continue with legal proceedings.
- 17 9. I further hope the court can appreciate that we are a small independent business, not a large
- 18 corporation, and in addition, we are struggling with the current economic conditions and
- 19 unprecedented times. This is not the only battle we are currently dealing with in trying to
- 20 keep our business afloat. Thus again, is why it is so important for us to be able to have added
- 21 time to obtain a firm who can provide us with the help we greatly need.

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25 DATED: April 9, 2025


YITZCHOK BIRNHACK
In Pro Per